

1 Mark Potter, Esq., Cal. Bar. No. 166317  
2 Sarah Anastasi, Esq., Cal. Bar. No. 322091  
3 **Potter Handy, LLP**  
4 100 Pine St., Ste 1250  
5 San Francisco, CA 94111  
6 (858) 375-7385; (888) 422-5191 fax  
7 Email: rsa@potterhandy.com  
8 *Counsel for Plaintiff*

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

MDL No. 3084 CRB

This Document Relates to:

Honorable Charles R. Breyer

R.M. v. Uber Technologies Inc., et al.

JURY TRIAL DEMANDED

CASE NO. 3:24-cv-02848-CRB

**FIRST AMENDED SHORT-FORM COMPLAINT**  
**AND DEMAND FOR JURY TRIAL**

The Plaintiff named below files this *First Amended Short-Form Complaint and Demand for Jury Trial* against Defendants named below by and through the undersigned counsel. Plaintiff incorporates by reference the allegations contained in *Plaintiffs' Master Long-Form Complaint* in *In Re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*, MDL No. 3084 in the United States District Court for the Northern District of California. Plaintiff files this *First Amended Short-Form Complaint* as permitted by Case Management Order No. 6 of this Court.

Plaintiff selects and indicates by checking-off where requested, the Parties and Causes of Actions specific to this case.

Plaintiff, by and through their undersigned counsel, allege as follows:

**I. DESIGNATED FORUM**<sup>1</sup>

1. Identify the Federal District Court in which the Plaintiff would have filed in the absence of direct filing:

Northern District of California

---

("Transferee District Court")

**II. IDENTIFICATION OF PARTIES**

**A. PLAINTIFF**

1. *Injured Plaintiff*: Name of the individual who alleges they were sexually assaulted, battered, harassed, or otherwise attacked by an Uber driver with whom they were paired while using the Uber platform:

R.M., an individual

---

("Plaintiff")

2. At the time of the filing of this *Short-Form Complaint*, Plaintiff resides at: Hartford, Hartford County, CT
- 

3. (If applicable) \_\_\_\_\_ [INSERT NAME OF REPRESENTATIVE] is filing this case in a representative capacity as the [INSERT DESCRIPTOR IE ADMINISTRATOR] of the [INSERT DESCRIPTOR IE ESTATE NAME, ETC], and has authority to act in this representative capacity because [INSERT BASIS FOR AUTHORITY].

**B. DEFENDANT(S)**

1. Plaintiff names the following Defendants in this action.

☒ UBER TECHNOLOGIES, INC.,<sup>2</sup>

☒ RASIER, LLC,<sup>3</sup>

☒ RASIER-CA, LLC.<sup>4</sup>

---

<sup>1</sup> See Pretrial Order No. 6, at II(C) (ECF No. 177).

<sup>2</sup> Delaware corporation with a principal place of business in California.

<sup>3</sup> A limited liability company whose sole member, Uber Technologies, Inc., is a citizen of Delaware and California.

<sup>4</sup> A limited liability company whose sole member, Uber Technologies, Inc., is a citizen of Delaware and California.

☐ OTHER (specify): \_\_\_\_\_. This defendant's residence is in (specify state): \_\_\_\_\_.

**C. RIDE INFORMATION**

1. The Plaintiff was sexually assaulted, harassed, battered, or otherwise attacked by an Uber driver in connection with a ride facilitated on the Uber platform in Hartford County, CT on 7/28/2023.

2. The Plaintiff was the account holder of the Uber account used to request the relevant ride.

3. The Plaintiff provides the following additional information about the ride:  
[PLEASE SELECT/COMPLETE ONE]

☒ The Plaintiff hereby incorporates Plaintiff's disclosure of ride information produced pursuant to Pretrial Order No. 5 ¶ 4 to be produced in compliance with deadlines set forth in Pretrial Order No. 5 ¶ 4, and any amendments or supplements thereto.

☐ The origin of the relevant ride was [STREET ADDRESS, CITY, COUNTY, STATE]. The requested destination of the relevant ride was [STREET ADDRESS, CITY, COUNTY, STATE]. The driver was named [DRIVER NAME].

**III. CAUSES OF ACTION ASSERTED**

1. The Causes of Action asserted in the *Plaintiffs' Master Long-Form Complaint*, and the allegations with regard thereto in the *Plaintiffs' Master Long-Form Complaint*, are adopted in this *Short-Form Complaint* by reference, except that Plaintiff opts out of and excludes the causes of action specified below:

///

Check any EXCLUDED causes of action	Cause of Action Number	Cause of Action
<input type="checkbox"/>	I	NEGLIGENCE (including Negligent Hiring, Retention, Supervision, and Entrustment)
<input type="checkbox"/>	II	FRAUD AND MISREPRESENTATION
<input type="checkbox"/>	III	NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
<input type="checkbox"/>	IV	COMMON CARRIER'S NON-DELEGABLE DUTY TO PROVIDE SAFE TRANSPORTATION <sup>5</sup>
<input type="checkbox"/>	V	OTHER NON-DELEGABLE DUTIES TO PROVIDE SAFE TRANSPORTATION <sup>6</sup>
<input type="checkbox"/>	VI	VICARIOUS LIABILITY FOR DRIVERS' TORTS - EMPLOYEE
<input type="checkbox"/>	VII	VICARIOUS LIABILITY FOR DRIVERS' TORTS - APPARENT AGENCY
<input type="checkbox"/>	VIII	VICARIOUS LIABILITY FOR DRIVERS' TORTS - RAIFICATION
<input type="checkbox"/>	IX	VICARIOUS LIABILITY FOR DRIVERS' TORTS - Cal. Public Utilities Code S 535
<input type="checkbox"/>	X	STRICT PRODUCTS LIABILITY - DESIGN DEFECT
<input type="checkbox"/>	XI	STRICT PRODUCTS LIABILITY - FAILURE TO WARN
<input type="checkbox"/>	XII	STRICT PRODUCTS LIABILITY - PRODUCT LIABILITY ACTS
<input type="checkbox"/>	XIII	UNFAIR COMPETITION LAW - Cal. Bus. & Prof. Code S 17200 et seq.

## VI. ADDITIONAL CAUSES OF ACTION AND/OR ALLEGATIONS

- Plaintiff asserts the following additional theories against the Defendants designated in paragraph \_\_ above:

N/A

- If Plaintiff has additional factual allegations not set forth in *Plaintiffs'*

<sup>5</sup> This claim is pleaded in the *Plaintiffs' Master Long-Form Complaint* under the laws of every state **except: Arizona, Colorado, District of Columbia, Illinois** (for incidents prior to August 11, 2023), **Michigan, Montana** (for incidents prior to April 23, 2023), **New York, Pennsylvania, Wisconsin, and Wyoming.**

<sup>6</sup> This claim is pleaded in *Plaintiffs' Master Long-Form Complaint* under the laws of every state **except: District of Columbia, Michigan, New York, Pennsylvania.**

Additional facts will be set forth in Plaintiff Fact Sheet to be submitted to court at a separate date.

**JURY DEMAND**

Dated: January 3, 2025

By: /s/*Sarah Anastasi*  
Sarah Anastasi, Esq.  
Attorney for Plaintiff